AMERICAN CIVIL LIBERTIES UNION FOUNDATION NATIONAL SECURITY PROJECT 122 MARYLAND AVENUE, N.E. WASHINGTON, D.C. 20002

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MARK H. LYNCH SUSAN W. SHAFFER Staff Counsel

May 16, 1985

Cornish F. Hitchcock, Esquire Public Citizen Litigation Group Suite 700 2000 P Street, N.W. Washington, D.C. 20036

Dear Con:

Thanks for the copy of Lesar's darft affidavit. I have forwarded it to Weisberg today.

In my view, the affidavit reveals privileged attorneyclient communications, and I think it would be improper
for Lesar to file it without Weisberg's consent. Accordingly,
I have asked him to review it not merely for factual
accuracy but also for the purpose of giving his consent
to its filing. I'll let you know as soon as I hear from
him.

Sincerely,

Mark H. Lynch

ML/skh